

# ROBERT GUILD

Attorney at Law

314 Pall Mall • Columbia, South Carolina 29201 • 803-252-1419 • bguild@mindspring.com

December 22, 2017

The Honorable Jocelyn G. Boyd  
Chief Clerk/Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive  
Columbia, SC 29210

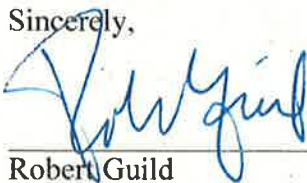
Re: PSCSC Docket No. 2017-332-E  
Southern Current LLC; Cypress Creek Renewables, LLC; and Birdseye  
Renewable Energy, LLC, Complainants/Petitioners v. Duke Energy  
Carolinas, LLC and Duke Energy Progress, LLC, Defendants/Respondents

Dear Ms. Boyd:

Please find attached for electronic filing the *Motion for Admission for Pro Hac Vice and Verified Application of Sky Stanfield and Laura Beaton* on behalf of the Interstate Renewable Energy Council, Inc. in the above-referenced matter.

Please contact me if you have any questions concerning this matter.

Sincerely,



---

Robert Guild  
Attorney at Law  
314 Pall Mall  
Columbia, SC 29201  
Telephone: 803-252-1419  
Email: bguild@mindspring.com

Attorney for the Interstate Renewable Energy  
Council, Inc.

955585.1



STATE OF SOUTH CAROLINA

## (Caption of Case)

Southern Current LLC: Cypress Creek Renewables,  
LLC; and Birdseye Renewable Energy, LLC,  
Complainants/Petitioners

v.

Duke Energy Carolinas, LLC and Duke Energy  
Progress, LLC, Defendants/RespondentsBEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

## COVER SHEET

DOCKET  
NUMBER: 2017 - 332 - E

(Please type or print)

Submitted by: Robert GuildAddress: 314 Pall MallColumbia, SC 29201SC Bar Number: 2358Telephone: 803-252-1419Fax: N/AOther: 803-917-5738Email: bguild@mindspring.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

## DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition☐ Request for item to be placed on Commission's Agenda  
expeditiously☒ Other: Routine

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)		
<input checked="" type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input checked="" type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other: _____
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest	
<input type="checkbox"/> Other: _____	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit	
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report	

Print Form

Reset Form

# ROBERT GUILD

Attorney at Law

314 Pall Mall • Columbia, South Carolina 29201 • 803-252-1419 • bguild@mindspring.com

December 22, 2017

South Carolina Supreme Court  
Office of Bar Admissions  
P.O. Box 11330  
Columbia, South Carolina 29211

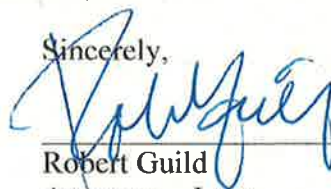
Re: PSCSC Docket No. 2017-332-E  
Southern Current LLC; Cypress Creek Renewables, LLC; and Birdseye  
Renewable Energy, LLC, Complainants/Petitioners v. Duke Energy  
Carolinas, LLC and Duke Energy Progress, LLC, Defendants/Respondents

Dear Clerk:

Enclosed for filing please find two Applications for Admission Pro Hac Vice for Sky Stanfield and Laura Beaton in the above referenced case. Also enclosed please find: Motion for Admission; two original Certificates of Good Standing from the State Bar of California, and two checks in the amount of \$250.00 for the required filing fees.

Please contact me if you have any questions.

Sincerely,



Robert Guild  
Attorney at Law  
314 Pall Mall  
Columbia, SC 29201  
Telephone: 803-252-1419  
Email: bguild@mindspring.com

Attorney for the Interstate Renewable Energy  
Council, Inc.

CC: Parties of Record  
Jocelyn G. Boyd, Chief Clerk, PSCSC

955557.1

**VERIFIED APPLICATION FOR ADMISSION *PRO HAC VICE*  
IN THE STATE OF SOUTH CAROLINA**

Southern Current LLC; Cypress  
Creek Renewables, LLC; and  
Birdseye Renewable Energy, LLC  
Plaintiff

2017-332-E

Case No.

Public Service Commission  
Tribunal

vs.

Mailing Address of Tribunal:

101 Executive Center Dr., Ste.  
100

Duke Energy Carolinas, LLC and  
Duke Energy Progress, LLC  
Defendant

Columbia, South Carolina 29210

Comes now Sky Stanfield, applicant herein, and respectfully represents the following:

1. Applicant resides at:

931 Scott Street, Apt. 4

Street Address

San Francisco

San Francisco

CA

94115

City

County

State

Zip Code

415-860-8624

Telephone

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of)

Shute, Mihaly & Weinberger LLP

, with offices at

396 Hayes Street

Street Address

San Francisco

San Francisco

CA

94102

City

County

State

Zip Code

415-552-7272

Primary Telephone

N/A

415-552-5816

Fax Number

stanfield@smwlaw.com

Email Address

3. Applicant has been retained personally or as a member of the above-named law firm by

Interstate Renewable Energy Council, Inc.

to provide legal representation in  
connection with the above case now pending before the above-named tribunal of the State of South Carolina.

4. Since December of 2006,

applicant has been, and presently is, a member in good standing of the bar of the highest court of the District of Columbia or the State of California where applicant regularly practices law. Attached is a certificate of good standing dated within the last 90 days from the bar of the highest court of the District of Columbia or the State where applicant regularly practices law.

5. Applicant has been admitted to practice before the following courts: (List all of the following courts applicant has been admitted to practice before: United States District Courts; United States Circuit Courts of Appeals; the Supreme Court of the United States; and courts of other states or the District of Columbia.)

Court:	Date Admitted:
Courts of California	December 1, 2016
United States District Court, Northern District of California	January 12, 2007

Applicant is presently a member in good standing of the bars of those courts listed above, except as listed below: (List any court named in the preceding paragraph that applicant is no longer admitted to practice before.)

Not Applicable

6. Applicant presently is not subject to any suspension or disbarment proceedings, and has not been formally notified of any complaints pending before a disciplinary agency, except as provided below (give particulars, e.g., jurisdiction, court date):

Affirmed

7. Applicant never has had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked, except as provided below (give particulars, e.g., date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation):

Affirmed

8. Applicant never has had any certificate or privilege to appear and practice before any court or administrative body suspended or revoked, except as provided below (give particulars, e.g., date, court, administrative body, date of suspension and reinstatement):

Affirmed

9. Local counsel of record associated with applicant in this case is Robert Guild  
of the Robert Guild, Attorney at Law law firm, which has offices at:

314 Pall Mall

Street Address

Columbia

Richland

SC

29201

City

County

State

Zip Code

803-252-1419

803-917-5738

N/A

bguild@mindspring.com

Primary Telephone

Cell Phone

Fax Number

Email Address

2358

South Carolina Bar Number

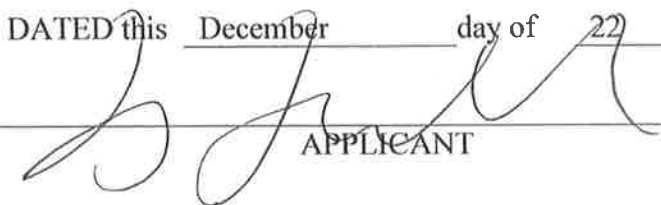
10. Applicant has previously filed an application to appear *pro hac vice* in the following South Carolina cases (give case name and status of litigation, date of application, local counsel of record in each case, and state whether application is pending or was granted).

PSCSC Docket No. 2015-362-E; Joint Application of Duke Energy Carolinas, LLC, Duke Energy Progress, LLC and South Carolina Electric & Gas Company for Approval of the Revised South Carolina Interconnection Standard; Status - Active, Application date - 11/23/2015; Local counsel - Robert Guild; Application - Granted

11. Applicant agrees to comply with the applicable statutes, laws and rules of the State of South Carolina and will familiarize him/herself with and comply with the South Carolina Rules of Professional Conduct. Applicant consents to the jurisdiction of the South Carolina courts and Commission on Lawyer Conduct.

12. Applicant respectfully requests to be admitted to practice in the above-named tribunal for this case only.

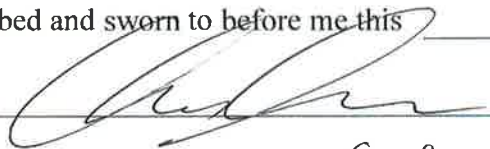
DATED this December day of 22, 20 17

  
\_\_\_\_\_  
APPLICANT

**VERIFICATION**STATE OF California )COUNTY OF San Francisco )

I, Sky Stanfield, do hereby swear or affirm under penalty of perjury that I am the applicant in the above-styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and belief, and that as to those matters I believe them to be true. I understand that I am under a continuing duty to promptly update the information provided in the application until the tribunal has ruled on the motion for admission pro hac vice. Further, if the motion is granted, I understand that I am under a continuing duty to promptly update the information provided in the application as long as I continue to appear pro hac vice in the action or proceeding. Any updated information shall be provided to both the tribunal that granted the motion and to the tribunal in which the action or proceeding may then be pending.

  
 APPLICANT/AFFIANT

 Subscribed and sworn to before me this 20 day of December, 20 17
  
 Notary Public for the State of California

 My Commission Expires: 05/19/18
**LOCAL COUNSEL CONSENT**

I hereby consent, as local counsel of record, to the association of applicant in this cause pursuant to Rules Governing Admission *Pro Hac Vice* to the South Carolina Bar.

 DATED this 20<sup>th</sup> day of DECEMBER, 20 17
  
 LOCAL COUNSEL OF RECORD
**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of this application upon the South Carolina Supreme Court by mail addressed to: South Carolina Supreme Court Office of Bar Admissions, PO Box 11330, Columbia, SC 29211, accompanied by payment of the \$250 filing fee payable to the South Carolina Supreme Court on this

22<sup>nd</sup> day of December, 20 17
  
 APPLICANT/AFFIANT





# THE STATE BAR OF CALIFORNIA

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1617

TELEPHONE: 888-800-3400

## CERTIFICATE OF STANDING

December 12, 2017

### TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, SKY CEDAR PEACOCK STANFIELD, #244966 was admitted to the practice of law in this state by the Supreme Court of California on December 1, 2006; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Trustees or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Louise Turner  
Custodian of Membership Records

**VERIFIED APPLICATION FOR ADMISSION *PRO HAC VICE*  
IN THE STATE OF SOUTH CAROLINA**

Southern Current LLC; Cypress  
Creek Renewables, LLC; and  
Birdseye Renewable Energy, LLC  
Plaintiff

2017-332-E  
Case No.

Public Service Commission  
Tribunal

vs.

Mailing Address of Tribunal: 101 Executive Center Dr., Ste.  
100

Duke Energy Carolinas, LLC and  
Duke Energy Progress, LLC  
Defendant

Columbia, South Carolina 29210

Comes now Laura Beaton, applicant herein, and respectfully represents the following:

1. Applicant resides at:

69 Whitney Street, Apt. B

Street Address

San Francisco

San Francisco

CA

94131

City

County

State

Zip Code

541-206-0282

Telephone

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of)

Shute, Mihaly & Weinberger LLP, with offices at

396 Hayes Street

Street Address

San Francisco

San Francisco

CA

94102

City

County

State

Zip Code

415-552-7272

N/A

415-552-5816

beaton@smwlaw.com

Primary Telephone

Cell Phone

Fax Number

Email Address

3. Applicant has been retained personally or as a member of the above-named law firm by

Interstate Renewable Energy Council, Inc. to provide legal representation in connection with the above case now pending before the above-named tribunal of the State of South Carolina.

4. Since December of 2013

, applicant has been, and presently is, a member in good standing of the bar of the highest court of the District of Columbia or the State of California where applicant regularly practices law. Attached is a certificate of good standing dated within the last 90 days from the bar of the highest court of the District of Columbia or the State where applicant regularly practices law.

5. Applicant has been admitted to practice before the following courts: (List all of the following courts

applicant has been admitted to practice before: United States District Courts; United States Circuit Courts of Appeals; the Supreme Court of the United States; and courts of other states or the District of Columbia.)

Court:	Date Admitted:
Courts of California	December 1, 2016
United States District Court, Northern District of California	May 2, 2016
United States District Court, Eastern District of California	August 26, 2016
United States Court of Appeals, Ninth Circuit	December 12, 2016
Courts of Montana	October 25, 2011 (inactive)

Applicant is presently a member in good standing of the bars of those courts listed above, except as listed below: (List any court named in the preceding paragraph that applicant is no longer admitted to practice before.)

Not Applicable

6. Applicant presently is not subject to any suspension or disbarment proceedings, and has not been formally notified of any complaints pending before a disciplinary agency, except as provided below (give particulars, e.g., jurisdiction, court date):

Affirmed

7. Applicant never has had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked, except as provided below (give particulars, e.g., date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation):

Affirmed

8. Applicant never has had any certificate or privilege to appear and practice before any court or administrative body suspended or revoked, except as provided below (give particulars, e.g., date, court, administrative body, date of suspension and reinstatement):

Affirmed

9. Local counsel of record associated with applicant in this case is Robert Guild  
of the Robert Guild, Attorney at Law law firm, which has offices at:

<u>314 Pall Mall</u>			
Street Address			
<u>Columbia</u>	<u>Richland</u>	<u>SC</u>	<u>29201</u>
City	County	State	Zip Code
<u>803-252-1419</u>	<u>803-917-5738</u>	<u>N/A</u>	<u>bguild@mindspring.com</u>
Primary Telephone	Cell Phone	Fax Number	Email Address
<u>2358</u>			
South Carolina Bar Number			

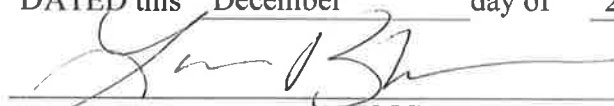
10. Applicant has previously filed an application to appear *pro hac vice* in the following South Carolina cases (give case name and status of litigation, date of application, local counsel of record in each case, and state whether application is pending or was granted).

11. Applicant agrees to comply with the applicable statutes, laws and rules of the State of South Carolina and will familiarize him/herself with and comply with the South Carolina Rules of Professional

Conduct. Applicant consents to the jurisdiction of the South Carolina courts and Commission on Lawyer Conduct.

12. Applicant respectfully requests to be admitted to practice in the above-named tribunal for this case only.

DATED this December day of 22, 20 17

  
\_\_\_\_\_  
APPLICANT

**VERIFICATION**STATE OF California )COUNTY OF San Francisco )

I, Laura Beaton, do hereby swear or affirm under penalty of perjury that I am the applicant in the above-styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and belief, and that as to those matters I believe them to be true. I understand that I am under a continuing duty to promptly update the information provided in the application until the tribunal has ruled on the motion for admission pro hac vice. Further, if the motion is granted, I understand that I am under a continuing duty to promptly update the information provided in the application as long as I continue to appear pro hac vice in the action or proceeding. Any updated information shall be provided to both the tribunal that granted the motion and to the tribunal in which the action or proceeding may then be pending.

  
APPLICANT/AFFIANT

Subscribed and sworn to before me this 20 day of December, 20 17



Notary Public for the State of California

My Commission Expires: 05/19/18

**LOCAL COUNSEL CONSENT**

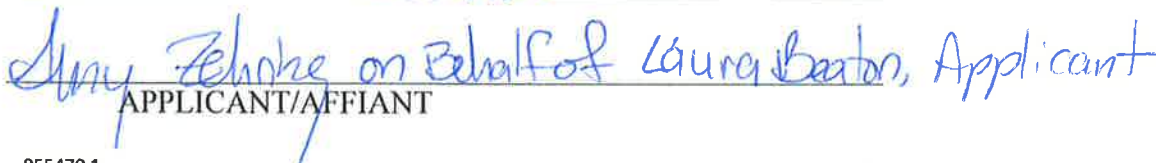
I hereby consent, as local counsel of record, to the association of applicant in this cause pursuant to Rules Governing Admission *Pro Hac Vice* to the South Carolina Bar.

DATED this 20th day of December, 20 17

  
LOCAL COUNSEL OF RECORD

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of this application upon the South Carolina Supreme Court by mail addressed to: South Carolina Supreme Court Office of Bar Admissions, PO Box 11330, Columbia, SC 29211, accompanied by payment of the \$250 filing fee payable to the South Carolina Supreme Court on this 22nd day of December, 20 17

  
APPLICANT/AFFIANT



# THE STATE BAR OF CALIFORNIA

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1617

TELEPHONE: 888-800-3400

## CERTIFICATE OF STANDING

December 12, 2017

### TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, LAURA DERISE BEATON, #294466 was admitted to the practice of law in this state by the Supreme Court of California on December 10, 2013; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Trustees or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Louise Turner  
Custodian of Membership Records

STATE OF SOUTH CAROLINA  
BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2017-332-E

In the Matter of:	)	
	)	
	)	MOTION FOR ADMISSION
Southern Current LLC; Cypress Creek	)	<i>PRO HAC VICE</i>
Renewables, LLC; and Birdseye Renewable	)	
Energy, LLC, Complainants/Petitioners	)	
	)	
v.	)	
	)	
Duke Energy Carolinas, LLC and Duke		
Energy Progress, LLC,		
Defendants/Respondents		

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The Interstate Renewable Energy Council, through its undersigned counsel, hereby moves the Public Commission of South Carolina ("Commission") to permit Sky C. Stanfield and Laura D. Beaton to practice *pro hac vice* before the Commission in the above-captioned matter.

Pursuant to SCACR 404, Ms. Stanfield and Ms. Beaton, together with counsel of record, are simultaneously filing with the South Carolina Supreme Court a Verified Application for Admission *Pro Hac Vice* in the State of South Carolina.

WHEREFORE, in accordance with the provisions set forth in Rule 404, SCACR, Petitioners respectfully request that this motion be granted.

Respectfully submitted this 22nd day of December, 2017.

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///

///





Robert Guild  
Attorney at Law  
314 Pall Mall  
Columbia, SC 29201  
803-252-1419  
bguild@mindspring.com

Counsel for the Interstate  
Renewable Energy Council,  
Inc.

955429.1

STATE OF SOUTH CAROLINA  
BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2017-332-E

In the Matter of:

Southern Current LLC; Cypress Creek  
Renewables, LLC; and Birdseye Renewable  
Energy, LLC, Complainants/Petitioners v.  
Duke Energy Carolinas, LLC and Duke  
Energy Progress, LLC,  
Defendants/Respondents

CERTIFICATE OF SERVICE

The undersigned, Robert Guild, does hereby certify that the following persons have been served with one (1) copy of Motion for Admission *Pro Hac Vice* and Verified Applications in the above captioned proceeding by electronic mail and/or U.S. First Class Mail at the addresses set forth below:

**Benjamin L. Snowden**, Counsel  
Kilpatrick Townsend & Stockton, LLP  
4208 Six Forks Road, Suite 1400  
Raleigh, NC 27609  
Phone: 919-420-1719  
Fax: 919-420-1800  
bsnowden@kilpatricktownsend.com  
**Heather Shirley Smith**, Deputy General  
Counsel  
Duke Energy Carolinas, LLC  
40 W. Broad Street, Suite 690  
Greenville, SC 29601  
Phone: 864-370-5045  
Fax: 864-370-5183  
heather.smith@duke-energy.com

**Frank R. Ellerbe, III**, Counsel  
Sowell Gray Robinson Stepp Laffitte, LLC  
Post Office Box 11449  
Columbia, SC 29211  
Phone: 803-227-1112  
Fax: 803-744-1556  
fellerbe@sowellgray.com  
**Jenny R. Pittman**, Counsel  
Office of Regulatory Staff  
1401 Main Street, Suite 900  
Columbia, SC 29201  
Phone: 803-737-0889/0794  
Fax: 803-737-0895  
jpittman@regstaff.sc.gov

**Rebecca J. Dulin**, Counsel  
Duke Energy Carolinas, LLC  
1201 Main Street, Suite 1180  
Columbia, SC 29201  
Phone: 803-988-7130  
Fax: 803-988-7123  
Rebecca.Dulin@duke-energy.com

**Richard L. Whitt**, Counsel  
Austin & Rogers, P.A.  
508 Hampton Street, Suite 300  
Columbia, SC 29201  
Phone: 803-251-7442  
Fax: 803-252-3679  
rlwhitt@austinrogerspa.com

Date: December 22, 2017

/s/ Robert Guild

Robert Guild  
Attorney at Law  
314 Pall Mall  
Columbia, SC 29201  
Telephone: 803-252-1419  
bguild@mindspring.com

Attorney for the Interstate  
Renewable Energy  
Council, Inc.

955542.1